

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BEECHWOOD RESTORATIVE CARE
CENTER, BROOK CHAMBERY, and
OLIVE CHAMBERY,

Plaintiffs,

-vs-

**DEFENDANTS'
PROPOSED
VERDICT FORM
02-CV-6235**

LAURA E. LEEDS, EDMUND RUSSELL
ALTONE, ROBERT W. BARNETT,
ANNA D. COLELLO, ARLENE L. GRAY,
HENRY M. GREENBERG, ANTONIA C.
NOVELLO, STEVEN B. STEINHARDT,
DENNIS P. WHALEN, SANFORD RUBIN,
SUSAN T. BAKER, SHARON A. CARLO,
CYNTHIA T. FRANCIS, NAOMI B. HAUSER,
JOSEPH P. MOORE, MARY ELIZABETH
RICH, and BARBARA W. SANER,

Defendants.

Defendants propose the following verdict form for the first phase (liability) of
the trial in this matter:

Verdict Form

For each defendant, do you find that the plaintiffs proved, by a preponderance of the evidence, that the defendant retaliated against the plaintiffs for exercising their First Amendment Constitutional rights?

1. Edmund Russell Altone Yes _____ No _____

2. Susan T. Baker Yes _____ No _____

3. Sharon A. Carlo Yes _____ No _____

4. Cynthia T. Francis Yes _____ No _____

5. Laura E. Leeds Yes _____ No _____

6. Mary Elizabeth Rich Yes _____ No _____

7. Sanford Rubin Yes _____ No _____

I CERTIFY THE ABOVE VERDICT TO BE TRUE AND ACCURATE.

Dated: _____, 2012
Rochester, New York

Foreperson: _____

Defendants request the opportunity to submit reply materials as needed.

Dated: June 6, 2012
Rochester, New York

ERIC T. SCHNEIDERMAN
Attorney General of the State of New York
Attorney for Defendants

s/Gary M. Levine
GARY M. LEVINE
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CERTIFICATE OF SERVICE

I certify that on June 6, 2012, I electronically filed the foregoing Defendants' Propose Verdict Form, with the Clerk of the District Court using CM/ECF system, which sent notification of such filing to the following:

1. Kevin S. Cooman, Esq.
25 East Main Street, Suite 500
Rochester, New York 14614
2. David Rothenberg, Esq.
45 Exchange Boulevard, Suite 800
Rochester, New York 14614
drothenberg@geigroth.com

And, I hereby certify that I have mailed, by the United States Postal Service, the document to the following non-CM/ECF participant(s):

1. n/a

ERIC T. SCHNEIDERMAN
Attorney General of the State of New York
Attorney for Defendants

s/Gary M. Levine
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